

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	Affirmation in Support
	:	of Application for
- v. -	:	Order of Continuance
	:	
TODD KOZEL	:	18 Mag. 10663
	:	
Defendant.	:	
	:	
- - - - -	x	

State of New York)
County of New York	: ss.:
Southern District of New York)

Sarah E. Paul, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Geoffrey S. Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).

2. On December 18, 2018, the defendant was arrested after being charged in a complaint, dated December 14, 2018, with violations of 18 U.S.C. §§ 1343, 1349, and 1956(h), as well as 18 U.S.C. § 2. On the day of his arrest, the defendant was presented before Magistrate Judge Debra Freeman. The defendant was released the following day on a set of bail conditions. The defendant is represented by David Meister, Esq.

3. As set by Judge Freeman during the defendant's presentment, the Government currently has until January 17, 2019 to charge the defendant by indictment or information.

4. Mr. Meister and I have had discussions regarding a possible disposition of this case. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under Rule 5.1 expires on January 17, 2019.

5. Therefore, the Government is requesting a 30-day continuance until February 18, 2019, to continue the foregoing discussions and reach a disposition of this matter. Earlier this month, I personally communicated with defense counsel and he specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
January 17, 2019



Sarah E. Paul
Assistant United States Attorney
Southern District of New York
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